

CAUSE NO. 2018-06748

PAULA CORNISH	§	IN THE DISTRICT COURT OF
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
HUDSON GROUP (HG) RETAIL, LLC	§	133RD JUDICIAL DISTRICT

DEFENDANTS' INITIAL DEFENSES AND ANSWER

Defendant Hudson Group (HG) Retail, LLC files its defenses and answer.

DEFENSES

1. Defendant invokes the doctrine of comparative negligence.

GENERAL DENIAL

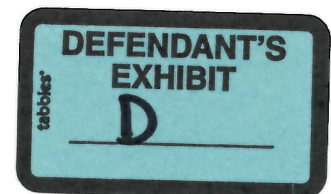
2. Defendant generally denies all the allegations and claims in the plaintiff's petition and respectfully requests that Plaintiff be required to prove all alleged claims, charges, allegations, and claimed damages by a preponderance of the evidence.

LIMITATION ON RECOVERY OF CLAIMED MEDICAL EXPENSES

3. Pursuant to Section 41.0105 of the Texas Civil Practice & Remedies Code, recovery of medical expenses is limited to the amount actually paid or incurred by or on behalf of the claimant. Plaintiff should not be allowed to submit any medical bills in excess of the "actually paid or incurred" amounts.

PRAYER

4. Defendant prays it be released, discharged, and acquitted of all claims, charges and allegations filed against it, that judgment be rendered in Defendant's favor, that Plaintiff take nothing by reason of this suit, that Defendant be awarded costs and all other relief to which Defendant is entitled.



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/s/ Norman Ray Giles

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded to the following counsel of record on this 20th day of March, 2018.

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